

Law Clerk's Copy

24

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NORTHLAND INSURANCE COMPANY,

Plaintiff,

Civil Action No.: 01 CV 763

vs.

LINCOLN GENERAL INSURANCE COMPANY,;
J.H.M. ENTERPRISES, INC., VERNICE L.
STATTS, ROBERT E. KRAPP and UTE L.
HETLAND CLARK, as Administrators of the
Estate of Karin Clifford and ROBERT E. KRAPP
and PATRICIA R. CLIFFORD, as Administrators
of the Estate of Robert R. Clifford, SHERRILL J.
MULLIGAN, DENIS A. MULLIGAN,

Defendants.

FILED
HARRISBURG, PA
MAY 22 2002
MARY E O'ANDREK CLERK
Per [Signature]

NOTICE OF MOTION BY PLAINTIFF
FOR SUMMARY JUDGMENT

COUNSEL:

PLEASE TAKE NOTICE that on a date to be set by the Court, plaintiff Northland Insurance Company ("Northland") will move pursuant to Rule 56 of the Federal Rules of Civil Procedure for judgment dismissing the complaint and counterclaims of Lincoln General Insurance Company ("Lincoln") on the basis that Northland and Lincoln have agreed to discontinue the claims and counterclaims of this declaratory judgment action.

KLETT ROONEY LIEBER & SCHORLING
Attorneys for Northland Insurance Company

By David I. Rosenbaum

David Ira Rosenbaum (52859)
Two Logan Square
18th And Arch Streets, 12th Floor
Philadelphia, PA 19103
(215) 567-7507 (Office)

OF COUNSEL:

Ira S. Lipsius, Esquire
SCHINDEL, FARMAN & LIPSIUS LLP
225 West 34th Street
New York, New York 10122
(212) 563-1710

Attorneys for Northland Insurance Company